

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

IN RE:)	
MEISHA ORDETTE MOORE)	CHAPTER 7
)	
DEBTOR(S))	
)	CASE NO. 22-58462-PMB
VS.)	
)	
OPPORTUNITY FINANCIAL, LLC)	
)	CONTESTED MATTER
RESPONDENT)	
)	
)	

MOTION TO AVOID LIEN

The Motion of Movant respectfully represents:

1.

Movant files this Motion pursuant to 11 U.S.C. Section 522(f) and Bankruptcy Rule 4003(d) to avoid a judicial lien on certain of Movant's property.

2.

Respondent obtained a judgment against the Debtor in the State Court of Fulton County, Georgia, Case No. 22EV004176 on or about September 21, 2022 in an unpaid balance of \$3,105.42 plus court costs.

3.

The existence of the Respondent's lien on Movant's property impairs exemptions allowed to the Movant pursuant to 11 U.S.C. Section 522(b) and O.C.G.A. § 44-13-100(a)(1)(4) and (6).

WHEREFORE, Movant prays for judgment against the Respondent for the cancellation and avoidance of the judicial lien, to the extent said lien impairs exemptions allowed to the Movant pursuant to 11 U.S.C. Section 522(b) and O.C.G.A. § 44-13-100(a)(a)(4) and (6), and for such other and further relief as is just.

Respectfully submitted this Friday, December 16, 2022.

/s/ Jeffrey B. Kelly
Jeffrey B. Kelly, Esquire
Attorney for Debtor
Bar No. 412798

Law Office of Jeffrey B. Kelly
107 E. 5th Avenue
Rome, GA 30161
(678) 861-1127(PHONE)
(706) 413-1365 (Fax)
lawoffice@kellycanhelp.com

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

IN RE:)	
MEISHA ORDETTE MOORE)	CHAPTER 7
)	
DEBTOR(S))	
)	CASE NO. 22-58462-PMB
VS.)	
)	
OPPORTUNITY FINANCIAL, LLC)	
)	CONTESTED MATTER
RESPONDENT)	
)	
)	

**NOTICE OF REQUIREMENT OF RESPONSE TO MOTION TO AVOID LIEN
ON EXEMPT PROPERTY AND OF TIME TO FILE SAME**

NOTICE IS HEREBY GIVEN that, on December 16, 2022, a **Motion to Avoid Lien** on exempt property pursuant to 11 U.S.C. Section 522 was filed in this case.

NOTICE IS FURTHER GIVEN that, pursuant to BLR 6008-1, Respondent must file a response to the motion within 21 days after service and serve a copy of said response upon Movant. If no response is time filed and served, the motion will be deemed unopposed and the Bankruptcy Court may enter an order granting the relief sought.

Respectfully submitted this Friday, December 16, 2022.

/s/ Jeffrey B. Kelly
Jeffrey B. Kelly, Esquire
Attorney for Debtor
Bar No. 412798

Law Office of Jeffrey B. Kelly
107 E. 5th Avenue
Rome, GA 30161
(678) 861-1127(PHONE)
(706) 413-1365 (Fax)
lawoffice@kellycanhelp.com

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

IN RE:)	
MEISHA ORDETTE MOORE)	CHAPTER 7
)	
DEBTOR(S))	
)	CASE NO. 22-58462-PMB
VS.)	
)	
OPPORTUNITY FINANCIAL, LLC)	
)	CONTESTED MATTER
RESPONDENT)	

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing **Motion to Avoid Lien on Exempt Property, together with the Notice of Requirement of Response to Motion to Avoid Lien on Exempt Property and of Time to File Same** on the following by U. S. Mail, in a properly stamped and addressed envelope.

Opportunity Financial, LLC
Control # 16024093
130 E. Randolph Street,
Suite 3400
Chicago, IL 60601

Cogency Global Inc.
900 Old Roswell Lakes Parkway
Suite 310
Roswell, GA 30076

Bleecker Brodey & Andrews
Attorneys for Plaintiff
9247 N Meridian St. Ste 101
Indianapolis, IN 46260

S. Gregory Hays
Chapter 7 Trustee
2964 Peachtree Rd NW
Suite 555
Atlanta, GA 30326

Meisha Ordette Moore
597 Millstone Dr.
Jonesboro, GA 30238

This Friday, December 16, 2022.

/s/ Jeffrey B. Kelly
Jeffrey B. Kelly, Esquire
Attorney for Debtor
Bar No. 412798
Law Office of Jeffrey B. Kelly
107 E. 5th Avenue
Rome, GA 30161
(678) 861-1127 (Phone)
(706) 413-1365 (Fax)
lawoffice@kellycanhelp.com